

SEC

19005817

OMB APPROVAL

OMB Number: 3235-0123

Expires: August 31, 2020 Estimated average burden hours per response..... 12.00

# ANIVAL AUDITED REPORT FORM X-17A-5SEC Mail Part III

SEC FILE NUMBER
8-67458

FACING PAGE

Fig.

Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule \$7875 Thereunder

Securitie	S Exchange Met	or 1754 and Itu	nout fine cande	•
REPORT FOR THE PERIOD BEGINNING 1/1/2018 AND ENDING		AND ENDING 12/3	2/31/2018	
	<u> </u>	MM/DD/YY		MM/DD/YY
	A. REGISTRAN	NT IDENTIFIC	ATION	
NAME OF BROKER-DEALER: <b>A</b>	VENTURA SE	CURITIES, LI	LC	OFFICIAL USE ONLY
ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)				FIRM I.D. NO.
15805 BISCAYNE BLVD	, SUITE 201			
	(	(No. and Street)		
NORTH MI	AMI BEACH	FL	33	3160
(City)		(State)	(Zip	Code)
NAME AND TELEPHONE NUMB DAN CAUCEGLIA	ER OF PERSON TO	CONTACT IN RI	EGARD TO THIS REPO	RT 305-466-0467
			(A	rea Code – Telephone Number
	B. ACCOUNTAL	NT IDENTIFIC	CATION	
INDEPENDENT PUBLIC ACCOU	NTANT whose opini	on is contained in	this Report*	
RUBIO CPA, PC				
	(Name – if in	idividual, state last, fir	st, middle name)	
2727 PACES FERRY RD SE	, STE 2-1680 AT	LANTA	GA	30339
(Address)	(City)		(State)	(Zip Code)
CHECK ONE:				
Certified Public Acco	ountant			
Public Accountant				
Accountant not reside	ent in United States of	or any of its posses	sions.	
	FOR OF	FICIAL USE ON	ILY	

<sup>\*</sup>Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)



### OATH OR AFFIRMATION

I, DAN	NIEL CAUCEGLIA	, swear (or affirm) that, to the best of
•	owledge and belief the accompanying financial statement TURA SECURITIES, LLC	
of DEC	CEMBER 31 , 20 18	, are true and correct. I further swear (or affirm) that
neither	the company nor any partner, proprietor, principal office	
	ied solely as that of a customer, except as follows:	
	, ,	
	WHO WAS SALES	
		000
		Signature
		Signature
		CEO C
		Title
This re	My COM  Notary Public  EXP	IMOTHY B. MOY MISSION # GG 183652 PRES: June 7, 2022 Tu Notary Public Underwriters
	Facing Page.	
	Statement of Financial Condition.	
	Statement of Income (Loss).	
	Statement of Changes in Financial Condition.	
	Statement of Changes in Stockholders' Equity or Partner	
	Statement of Changes in Liabilities Subordinated to Claim	ms of Creditors.
<b>(g)</b>	Computation of Net Capital.	
	Computation for Determination of Reserve Requirement	
[i]	Information Relating to the Possession or Control Requi	
<b>□</b> (i)	A Reconciliation, including appropriate explanation of th	
_ ".	Computation for Determination of the Reserve Requiren	
∐ (k)		tements of Financial Condition with respect to methods of
	consolidation.	
	An Oath or Affirmation.	
	A copy of the SIPC Supplemental Report.	ist or found to have existed since the date of the previous audit.
(n)	A report describing any material inadequactes found to ex-	ist of found to have existed since the date of the previous audit.

<sup>\*\*</sup>For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

### AVENTURA SECURITIES, LLC FINANCIAL STATEMENTS AND SCHEDULES

For the Year Ended
December 31, 2018
With Report of Registered Public Accounting Firm

CERTIFIED PUBLIC ACCOUNTANTS

2727 Paces Ferry Road SE Building 2, Suite 1680 Atlanta, GA 30339 Office: 770 690-8995

Fax: 770 838-7123

### REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Member of Aventura Securities, LLC

### Opinion on the Financial Statements

We have audited the accompanying statement of financial condition of Aventura Securities, LLC (the "Company") as of December 31, 2018, the related statements of operations, changes in member's equity, and cash flows for the year then ended and the related notes (collectively referred to as the "financial statements"). In our opinion, the financial statements present fairly, in all material respects, the financial position of the Company as of December 31, 2018, and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

### **Basis for Opinion**

These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on the Company's financial statements based on our audits. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) ("PCAOB") and are required to be independent with respect to the Company in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audit in accordance with the standards of the PCAOB. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement, whether due to error or fraud. The Company is not required to have, nor were we engaged to perform, an audit of its internal control over financial reporting. As part of our audits we are required to obtain an understanding of internal control over financial reporting but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control over financial reporting. Accordingly, we express no such opinion.

Our audits included performing procedures to assess the risks of material misstatement to the financial statements, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements. Our audits also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the financial statements. We believe that our audits provide a reasonable basis of our opinion.

### Supplemental Information

The information contained in Schedules I, II and III has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statements. The supplemental information is the responsibility of the Company's management. Our audit procedures included determining whether the information in Schedules I, II and III reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the accompanying schedules. In forming our opinion on the accompanying

schedules, we evaluated whether the supplemental information, including its form and content, is presented in conformity with 17 C.F.R. §240.17a-5. In our opinion, the aforementioned supplemental information is fairly stated, in all material respects, in relation to the financial statements as a whole.

We have served as the Company's auditor since 2005.

February 25, 2019 Atlanta, Georgia

> Rubio CPA, PC Rubio CPA, PC

## AVENTURA SECURITIES, LLC STATEMENT OF FINANCIAL CONDITION December 31, 2018

### **ASSETS**

Cash	\$	56,305
Accounts receivable		3,231
Securities owned		160,803
Due from clearing broker		73,030
Deposit with clearing broker		75,000
Due from related party		22,500
Prepaid expenses and other assets		12,180
Total assets	\$	403,049
LIABILITIES AND MEMBER'S EQUITY		
Liabilities	•	00.000
Accounts payable and accrued expenses	\$	22,263
Due to clearing broker		6
Due to related parties	<del>-,</del>	14,922
Total liabilities		37,191
Member's equity		365,858
Total liabilities and member's equity	\$	403,049

### AVENTURA SECURITIES, LLC STATEMENT OF OPERATIONS For the Year Ended December 31, 2018

REVENUES Commissions Mutual fund fees Principal transactions Fees from related parties Margin interest income Interest income	\$ 253,516 155,472 554 90,000 18,214 1,295
Total revenue	 519,051
EXPENSES	
Compensation and benefits	287,234
Clearance fees	89,054
Communications	5,023
Occupancy	11,828
Other operating expenses	98,819
Total expenses	 491,958
NET INCOME	\$ 27,093

### AVENTURA SECURITIES, LLC STATEMENT OF CHANGES IN MEMBER'S EQUITY For the Year Ended December 31, 2018

Balance, December 31, 2017	\$ 353,765
Member's Draw	(15,000)
Net Income	 27,093
Balance, December 31, 2018	\$ 365,858

The accompanying notes are an integral part of these financial statements.

### AVENTURA SECURITIES, LLC STATEMENT OF CASH FLOWS For the Year Ended December 31, 2018

CASH FLOWS FROM OPERATING ACTIVITIES:		
Net income	\$	27,093
Adjustments to reconcile net income to net cash provided by operating activities:		
Decrease in accounts receivable		143
Decrease in due from clearing broker		75,129
Increase in prepaid expenses		(1,635)
Decrease in due from related party		22,500
Increase in accounts payable and accrued expenses		14,611
Decrease in due to clearing broker		(1,501)
Decrease in due to related parties		(4,177)
Net cash provided by operating activities		132,163
		•
CASH FLOWS FROM INVESTING ACTIVITIES:		
Purchase of securities owned		(160,803)
Net cash used by investing activities		(160,803)
CASH FLOWS FROM FINANCING ACTIVITIES:		
Member Distributions		(15,000)
Net cash used by financing activities		(15,000)
NET DECREASE IN CASH		(43,640)
CASH:		
Beginning of period		99,945
	¢	EC 20E
End of period	Φ	56,305
Cumplemental displacate of socia flow information		
Supplemental disclosure of cash flow information	¢	2 070
Cash paid during the year for interest	<u>\$</u>	2,970

### NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

**Organization and Description of Business**: Aventura Securities, LLC (the "Company"), a Delaware Limited Liability Company organized in August 2006, is a securities broker-dealer registered with the Securities and Exchange Commission ("SEC") and the Financial Industry Regulatory Authority ("FINRA").

The Company is wholly-owned by Aventura Holdings, LLC.

The Company operates as a "general securities" broker-dealer executing trades for institutional and retail customers. The Company does not carry customer accounts or perform custodial functions relating to customer securities. Customers of the Company are introduced to a carrying broker-dealer (clearance agent) on a fully disclosed basis. The Company's customers are located throughout the United States.

**Income Taxes**: The Company is taxed as a sole proprietorship. Therefore the income or losses of the Company flow through to its member and no income taxes are recorded in the accompanying financial statements.

The Company has adopted the provisions of FASB Accounting Standards Codification 740-10, Accounting for Uncertainty in Income Taxes. Under ASC 740-10, the Company is required to evaluate each of its tax positions to determine if they are more likely than not to be sustained if the taxing authority examines the respective position. A tax position includes an entity's status, including its status as a pass-through entity, and the decision not to file a tax return. The Company has evaluated each of its tax positions and has determined that no provision or liability for income taxes is necessary.

**Estimates**: Management uses estimates and assumptions in preparing financial statements in accordance with generally accepted accounting principles. Those estimates and assumptions affect the reported amounts of assets, liabilities, revenues and expenses. Actual results could vary from the estimates that were assumed in preparing the financial statements.

**Cash**: The Company maintains its cash and cash equivalents deposits in high credit quality financial institutions. Balances at times may exceed federally insured limits.

**Securities Owned:** Investments in securities owned consisted of mutual funds at December 31, 2018. The securities owned are valued at market value. The resulting difference between cost and market (or fair value) is included in income. Proprietary securities transactions are recorded on the trade date as if they had settled.

### NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

**Revenue Recognition**: The Financial Accounting Standards Board (FASB), has issued a comprehensive new revenue recognition standard that supersedes most existing revenue recognition guidance under GAAP (FASB Accounting Standards Codification 606). The Company adopted this standard effective January 1, 2018.

The standard's core principle is that an entity should recognize revenue when it transfers promised goods or services to customers in an amount that reflects the consideration to which the entity expects to be entitled in exchange for those goods or services. ASU 2014-09 prescribes a five-step process to accomplish this core principle, including:

- Identification of the contract with the customer;
- Identification of the performance obligation(s) under the contract;
- \* Determination of transaction price;
- Allocation of the transaction price to the identified performance obligation(s); and
- Recognition of revenue as (or when) an entity satisfies the identified performance obligation(s).

The Company recognizes commission and trading revenue upon the execution of the underlying trade as this satisfies the only performance obligation identified in accordance with this standard.

Mutual Funds or pooled investment vehicles (collectively, "funds") have entered into agreements with the Company to distribute/sell its shares to investors. Marketing or distribution fees are paid over time (12b-1 fees) on the basis of a contractual rate applied to the monthly or quarterly market value of the fund. Revenue is recognized as these fees are earned in accordance with the underlying agreements.

Application of the standard in 2018 using the modified retrospective approach had no effect on reported financial position, results of operations or related disclosures.

**Date of Management's Review**: Subsequent events were evaluated through the date the financial statements were issued.

### NOTE B - NET CAPITAL REQUIREMENTS

The Company is subject to the Securities and Exchange Commission Uniform Net Capital Rule (Rule 15c3-1), which requires the maintenance of minimum net capital and requires that the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 15 to 1. At December 31, 2018, the Company had net capital of 315,516, which was \$310,516 more than its required net capital of \$5,000 and the ratio of aggregate indebtedness to net capital was .12 to 1.0.

#### NOTE C - OFF BALANCE SHEET RISK

In the normal course of business, the Company's customers execute securities transactions through the Company. These activities may expose the Company to off balance sheet risk in the event the customer or other broker is unable to fulfill its contracted obligations and the Company has to purchase or sell the finanial instrument underlying the contract at a loss.

### NOTE D - CLEARANCE AGREEMENT

The Company has an agreement with a clearing broker to execute and clear, on a fully disclosed basis, customer accounts of the Company. In accordance with this agreement, the Company is required to maintain a deposit in cash or securities.

The Company's clearing agreement requires that a minimum balance of \$75,000 be maintained on deposit with the clearing broker and that minimum net capital of \$150,000 be maintained.

### NOTE E - RELATED PARTY TRANSACTIONS

The Company has an expense sharing agreement with its member. Under the agreement the Company pays its member monthly fees for use of office facilities, including office furniture and equipment, and other administrative services. The amount expensed in the financial statements for 2018 under the arrangement is approximately \$64,308. The due to related parties at December 31, 2018 arose from this agreement.

During 2018, the Company received \$90,000 of administrative fees from a related Registered Investment Advisor entity pursuant to an informal agreement. These fees primarily relate to sevices such as the execution of mutual fund and fixed income trades on behalf of the related entity. The due from related party at December 31, 2018 arose from this agreement.

### NOTE F - RETIREMENT PLAN

The Parent has adopted a defined benefit plan and a profit sharing plan. The amount expensed in the accompanying financial statements for 2018 pursuant to these plans is approximately \$13,000.

#### NOTE G - FAIR VALUE MEASUREMENTS

FASB ASC 820 defines fair value, establishes a framework for measuring fair value, and establishes a fair value hierarchy which prioritizes the inputs to valuation techniques. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. A fair value measurement assumes that the transaction to sell the asset or transfer the liability occurs in the principal market for the asset or liability or, in the absence of a principal market, the most advantageous market. Valuation techniques that are consistent with the market, income or cost approach, as specified by FASB ASC 820 are used to measure fair value.

The fair value hierarchy prioritizes the inputs to valuation techniques used to measure fair value into three broad levels:

- Level 1 inputs are quoted prices (unadjusted) in active markets for identical assets or liabilities the Company has the ability to access.
- Level 2 inputs are inputs (other than quoted prices included within level 1) that are observable for the asset or liability, either directly or indirectly.
- Level 3 are unobservable inputs for the asset or liability and rely on management's own assumptions about the assumptions that market participants would use in pricing the asset or liability.

The following table presents the Company's fair value heirarchy for those assets and liabilities measured at fair value on a recurring basis as of December 31, 2018.

	Mea	air Value surements aber 31, 2018	-	Level 1 aluation	Level 2 Valuation	Level 3 Valuation
Securities owned, mutual funds, equity	_\$	19,785	\$	19,785		
Securities owned, mutual funds, fixed income		141,018		141,018		
Total	\$	160,803	\$	160,803	-	_

### **AVENTURA SECURITIES, LLC**

## Supplementary Information Pursuant to rule 17(a)-5 of the Securities Exchange Act of 1934

**December 31, 2018** 

The accompanying schedule I is prepared in accordance with the requirements and general format of FOCUS Form X-17 A-5.

### **AVENTURA SECURITIES, LLC**

# SCHEDULE I COMPUTATION OF NET CAPITAL UNDER RULE 15c3-1 OF THE SECURITIES AND EXCHANGE COMMISSION ACT OF 1934

### **December 31, 2018**

Net Capital	
Total member's equity qualified for net capital	\$ 365,858
Deduction for non-allowable assets:	
Accounts receivable	(3,231)
Prepaid expenses	(12,180)
Due from related party	 (22,500)
Net capital before haircuts	327,947
Less haircuts	 12,431
Net capital	 315,516
Minimum net capital required (greater than \$5,000 or 6 2/3% of aggregate indebtedness)	 5,000
Excess net capital	 310,516
Aggregate Indebtedness:	
Liabilities	 37,191
Ratio of aggregate indebtedness to net capital	 12 to 1.0

RECONCILIATION WITH COMPANY'S COMPUTATION OF NET CAPITAL INCLUDED IN PART IIA OF FORM X-17A-5 AS OF DECEMBER 31, 2018.

There was no significant difference between net capital in Part IIA of Form X-17A-5 and net capital above.

### **AVENTURA SECURITIES, LLC**

# SCHEDULE II COMPUTATION FOR DETERMINATION OF THE RESERVE REQUIREMENTS UNDER THE SECURITIES AND EXCHANGE COMMISSION RULE 15c3-3 December 31, 2018

The Company is not required to file the above schedules as it is exempt from Securities and Exchange Commission Rule 15c3-3 under paragraph (k)(2)(ii) of the rule and does not hold customers' monies or securities.

# SCHEDULE III INFORMATION RELATING TO THE POSSESSION OR CONTROL REQUIREMENTS UNDER THE SECURITIES AND EXCHANGE COMMISSION RULE 15c3-3 December 31, 2018

The Company is not required to file the above schedules as it is exempt from Securities and Exchange Commission Rule 15c3-3 under paragraph (k)(2)(ii) of the rule and does not hold customers' monies or securities.

CERTIFIED PUBLIC ACCOUNTANTS

2727 Paces Ferry Road SE Building 2, Suite 1680 Atlanta, GA 30339 Office: 770 690-8995

Fax: 770 838-7123

### REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Member of Aventura Securities, LLC

We have reviewed management's statements, included in the accompanying Broker Dealers Annual Exemption Report in which (1) Aventura Securities, LLC identified the following provisions of 17 C.F.R. § 15c3-3(k) under which Aventura Securities, LLC claimed an exemption from 17 C.F.R. § 240.15c3-3: (k)(2)(ii) (the "exemption provisions"); and, (2) Aventura Securities, LLC stated that Aventura Securities, LLC met the identified exemption provisions throughout the most recent fiscal year without exception. Aventura Securities, LLC's management is responsible for compliance with the exemption provisions and its statements.

Our review was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included inquiries and other required procedures to obtain evidence about Aventura Securities, LLC's compliance with the exemption provisions. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, we do not express such an opinion.

Based on our review, we are not aware of any material modifications that should be made to management's statements referred to above for them to be fairly stated, in all material respects, based on the provisions set forth in paragraph (k)(2)(ii), of Rule 15c3-3 under the Securities Exchange Act of 1934.

February 25, 2019 Atlanta, GA

> Aubio CPA, PC Rubio CPA, PC

### **BROKER DEALERS ANNUAL EXEMPTION REPORT**

Aventura Securities, LLC claims an exemption from the provisions of Rule 15c3-3 under the Securities and Exchange Act of 1934, pursuant to paragraph (k)(2)(ii) of the Rule.

Aventura Securities, LLC met the aforementioned exemption provisions throughout the most recent year ended December 31, 2018 without exception.

Daniel Cauceglia February 19, 2019

15805 Biscayne Blvd, Suite 201, North Miami Beach, FL 33160 Phone: 305.466.0467 Toll Free: 866.466.0467 Fax: 305.675.3369

CERTIFIED PUBLIC ACCOUNTANTS

2727 Paces Ferry Road SE Building 2, Suite 1680 Atlanta, GA 30339 Office: 770 690-8995 Fax: 770 838-7123

### INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES RELATED TO AN ENTITY'S SIPC ASSESSMENT RECONCILIATION

To the Member of Aventura Securities, LLC

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934, we have performed the procedures enumerated below with respect to the accompanying General Assessment Reconciliation (Form SIPC-7) to the Securities Investor Protection Corporation (SIPC) for the year ended December 31, 2018, which were agreed to by Aventura Securities, LLC and the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc. and SIPC, solely to assist you and the other specified parties in evaluating Aventura Securities, LLC's compliance with the applicable instructions of the General Assessment Reconciliation (Form SIPC-7). Aventura Securities, LLC's management is responsible for Aventura Securities, LLC's compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose. The procedures we performed and our findings are as follows:

- 1. Compared the listed assessment payments in Form SIPC-7 with respective cash disbursement records entries, noting no differences;
- 2. Compared the Total Revenue amounts of the audited Form X-17A-5 for the year ended December 31, 2018, with the amounts reported in Form SIPC-7 for the year ended December 31, 2018, noting no differences;
- 3. Compared adjustments reported in Form SIPC-7 with supporting schedules and working papers, noting no differences; and,
- 4. Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the related schedules and working papers supporting the adjustments, noting no differences.

We were not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than these specified parties.

February 25, 2019 Atlanta, GA

Rubio CPA, PC

## (35-REV 6/17)

## SECURITIES INVESTOR PROTECTION CORPORATION P.O. Box 92185 Washington, D.C. 20090-2185 202-371-8300 General Assessment Reconciliation

(35-REV 6/17)

For the fiscal year ended 2018
(Read carefully the instructions in your Working Copy before completing this Form)

### TO BE FILED BY ALL SIPC MEMBERS WITH FISCAL YEAR ENDINGS

1. Name of Member, address, Designated Examining Authority purposes of the audit requirement of SEC Rule 17a-5:	r, 1934 Act registration no. and mor	nth in which fiscal year ends for
067458 FINRA DEC AVENTURA SECURITIES LLC 15805 BISCAYNE BLVD, STE 201	_ mailing lab any correc	y of the information shown on the sel requires correction, please e-mail tions to form@sipc.org and so the form filed.
NORTH MIAMI BEACH, FL 33160		telephone number of person to specting this form.
	ROBEF	RT DE VITO
2. A. General Assessment (item 2e from page 2)		\$ <u>384.60</u>
B. Less payment made with SIPC-6 filed (exclude interest) 08/13/2018		(143.27
Date Paid C. Less prior overpayment applied		( <b>0</b>
D. Assessment balance due or (overpayment)		241.33
E. Interest computed on late payment (see instruction E)	for days at 20% per annum	0
F. Total assessment balance and interest due (or overpay		<u>\$</u> 241.33
G. PAYMENT: √ the box Check mailed to P.O. Box Total (must be same as F above)  Funds Wired	<sub>\$</sub> 241.33	
H. Overpayment carried forward	\$(	_)
3. Subsidiaries (S) and predecessors (P) included in this form	(give name and 1934 Act registrati	ion number):
	and the state of t	
The SIPC member submitting this form and the person by whom it is executed represent thereby	AUGURA	- Sprunder
that all information contained herein is true, correct and complete.	(Name of Corporation, Par	tnerenip or other organization)
Dated the Mo day of FEBRUM, 20 19.	Authoriz	en Signature)
This form and the assessment payment is due 60 days after for a period of not less than 6 years, the latest 2 years in a	er the end of the fiscal year. Retai	Title) In the Working Copy of this form
a portou of not tood than o jours, the latest a jears in t	er agail sagaganta histori	
Dates: Postmarked Received Review	ved	
Dates: Postmarked Received Review Calculations Docum Exceptions:	entation	Forward Copy
Exceptions:		
Disposition of exceptions:		

### DETERMINATION OF "SIPC NET OPERATING REVENUES" AND GENERAL ASSESSMENT

Amounts for the fiscal period beginning January 1, 2018 and ending Occumber 31, 2018

Item No. 2a. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)	Eliminate cents \$ 519,051
<ul> <li>Additions:         <ul> <li>(1) Total revenues from the securities business of subsidiaries (except foreign subsidiaries) and predecessors not included above.</li> </ul> </li> </ul>	
(2) Net loss from principal transactions in securities in trading accounts.	
(3) Net loss from principal transactions in commodities in trading accounts.	- Particular to the second
(4) Interest and dividend expense deducted in determining item 2a.	
(5) Net loss from management of or participation in the underwriting or distribution of securities.	
(6) Expenses other than advertising, printing, registration fees and legal fees deducted in determining net profit from management of or participation in underwriting or distribution of securities.	AND THE RESIDENCE AND ADMINISTRATION OF THE PROPERTY OF THE PR
(7) Net loss from securities in investment accounts.	
Total additions	
<ul> <li>2c. Deductions:         <ul> <li>(1) Revenues from the distribution of shares of a registered open end investment company or unit investment trust, from the sale of variable annuities, from the business of insurance, from investment advisory services rendered to registered investment companies or insurance company separate accounts, and from transactions in security futures products.</li> </ul> </li> </ul>	166,315
(2) Revenues from commodity transactions.	
(3) Commissions, floor brokerage and clearance paid to other SIPC members in connection with securities transactions.	89,054
(4) Reimbursements for postage in connection with proxy solicitation.	
(5) Net gain from securities in investment accounts.	
(6) 100% of commissions and markups earned from transactions in (i) certificates of deposit and (ii) Treasury bills, bankers acceptances or commercial paper that mature nine months or less from issuance date.	
(7) Direct expenses of printing advertising and legal fees incurred in connection with other revenue related to the securities business (revenue defined by Section 16(9)(L) of the Act).	
(8) Other revenue not related either directly or indirectly to the securities business. (See Instruction C):	
(Deductions in excess of \$100,000 require documentation)	
(9) (i) Total interest and dividend expense (FOCUS Line 22/PART IIA Line 13, Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income.  \$2,970	
(ii) 40% of margin interest earned on customers securities accounts (40% of FOCUS line 5, Code 3960).  \$7,285	7.005
Enter the greater of line (i) or (ii)	7,285
Total deductions	262,654
2d. SIPC Net Operating Revenues	\$ <u>256,397</u>
2e. General Assessment @ .0015 Rate effective 1/1/2017	\$ <u>384.60</u>
	(to page 1, line 2.A.)